

Planning Department

Arun District Council
Arun Civic Centre,
Maltravers Road
Littlehampton
BN17 5LF



2nd October 2026

Dear Planning Officer

Re: Heath Place, Ash Grove, Bognor Regis, PO22 9SH

Proposal: Erection of an external passenger lift

Applicant: Ponders End Investments Plc

Document: Biodiversity Enhancement Statement

Please find enclosed a Biodiversity Enhancement Statement, prepared on behalf of our client, Ponders End Investments Plc, the freeholder of Heath Place, in support of the full planning application for the erection of an external passenger lift at the above property. This Statement sets out how the proposal has been designed to protect the existing on-site natural environment and how it will deliver proportionate, practical enhancements for biodiversity. It should be read alongside the Supporting Planning Statement dated 14th August 2026, the Heath Place Location Plan and the Heath Place Lift Drawing.

The Site and the Proposal

Heath Place is an established commercial building fronting Ash Grove, on the eastern side of the road within a predominantly commercial and industrial park setting. The site is not subject to any statutory nature conservation designation.

The proposal comprises a compact, purpose-designed lift shaft positioned tight against the north west elevation of the building, providing step-free access from external ground level to the first floor. The lift framework will match the colour of the existing external cladding and the shaft will be glazed on its two external faces. The structure occupies a footprint of approximately 3m².

Critically, the lift will be sited entirely on land that is already paved and hard landscaped. No grass, planting beds, shrubs, hedgerows or trees will be removed or affected, and there will be no loss of soft landscaping or of any habitat of ecological value as a result of the development.

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Legislative and Policy Context

Schedule 7A of the Town and Country Planning Act 1990 (as inserted by the Environment Act 2021) requires most grants of planning permission to be subject to a general condition securing a minimum 10% biodiversity net gain. Development is exempt from that requirement where it does not impact a priority habitat and impacts less than 25m² of on-site habitat (or 5m of linear habitat) – the de minimis exemption. Sealed surfaces such as paving and hardstanding have zero baseline value under the statutory biodiversity metric. As the proposal affects only around 3m² of existing hardstanding and no priority habitat, it falls well within the de minimis exemption and the statutory biodiversity gain condition does not apply. Notwithstanding this, our client is committed to delivering a net improvement for biodiversity on site, as set out below.

Chapter 15 of the National Planning Policy Framework (December 2024) seeks to conserve and enhance the natural environment. Paragraph 187(d) expects planning decisions to minimise impacts on and provide net gains for biodiversity, whilst paragraph 193(d) states that opportunities to improve biodiversity in and around developments should be integrated as part of their design.

At the local level, Policy ENV SP1 (Natural Environment) of the Arun Local Plan 2011–2031 seeks to protect and enhance the District's natural environment and biodiversity, and Policy ENV DM5 (Development and biodiversity) requires development to avoid harm to biodiversity and to incorporate measures which enhance it where practicable.

Existing Ecological Baseline

The part of the site directly affected by the proposal is existing paved hardstanding immediately adjoining the building elevation. This surface supports no vegetation and offers no foraging, nesting, roosting or commuting value for wildlife. Accordingly:

- no trees, hedgerows or other vegetation will be removed or pruned to accommodate the works;
- no habitat suitable for protected or priority species will be lost or disturbed;
- the external walls and roof of the host building are not being altered other than at the point of connection with the lift at first floor level, and no roof voids, soffits or other potential roosting features will be disturbed; and
- the development creates no additional residential accommodation or overnight occupancy, and so gives rise to no recreational pressure on designated sites, nor any additional water demand or wastewater discharge.

Given the nature and condition of the affected land, the proposal will have no adverse effect on biodiversity and a specialist ecological survey is not considered necessary or proportionate.

Protection of the Existing Natural Environment

Although the works are confined to hard surfacing, the following best practice measures will be adopted during construction to safeguard any landscaping, planting or wildlife on or adjacent to the site:

- **Contained working area:** all construction activity, plant, materials storage and welfare facilities will be confined to existing hard surfaced areas. No materials, spoil or machinery will be stored on, or tracked across, any grassed or planted areas.
- **Protection of adjacent vegetation:** any trees, shrubs or planting near the working area will be protected from physical damage, compaction and contamination for the duration of the works.
- **Pollution prevention:** fuels, oils, cement and other materials will be stored and handled to prevent spills and run-off into surface water drains or soft ground, with spill kits available on site.
- **Wildlife awareness:** open excavations for the lift pit and foundations will be covered overnight, or provided with a means of escape, to prevent animals becoming trapped. Should any protected species be encountered, works will stop and advice will be sought from a suitably qualified ecologist.
- **Waste management:** construction waste will be removed from site promptly and disposed of responsibly.

Biodiversity Enhancement Measures

Whilst there is no loss of habitat to be compensated for, our client would be willing to propose if necessary and reasonable etc, a bird nesting box (for example a swift box or sparrow terrace) on a suitable elevation of the host building, at a height and orientation in accordance with recognised guidance, to provide new nesting opportunities in an otherwise developed setting.

This measure is proportionate enhancement so that the site is left in a measurably better condition for wildlife than at present and if deemed necessary will be installed prior to the first use of the lift and thereafter retained. Our client would be content for their implementation to be secured by an appropriately worded planning condition, should the Council consider this necessary.

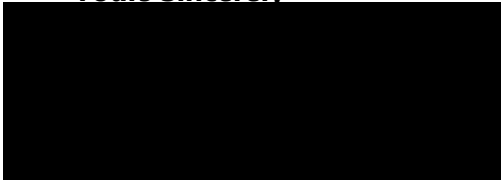
Conclusion

The proposed external passenger lift is a modest development with a footprint of approximately 3m², located entirely on existing paved and hard landscaped ground. It will result in no loss of soft landscaping, vegetation or habitat, and is exempt from the statutory biodiversity net gain requirement under the de minimis exemption. The construction safeguards set out above will

ensure that the existing on-site natural environment is fully protected during the works, whilst the enhancement measure – new bird boxes – will deliver a genuine improvement for biodiversity at Heath Place. The application therefore accords with Chapter 15 of the National Planning Policy Framework and Policies ENV SP1 and ENV DM5 of the Arun Local Plan 2011–2031.

Please do not hesitate to contact me if you have any queries.

Yours Sincerely



Matt Annen BSc MSc MRTPI

